

SESSION III
P² INITIATIVES

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**ACHIEVING ENVIRONMENTAL EXCELLENCE THROUGH
THE SOUTH CAROLINA/DEPARTMENT OF DEFENSE
POLLUTION PREVENTION ALLIANCE**

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INTRODUCTION

The South Carolina Environmental Excellence program and the South Carolina/Department of Defense Pollution Prevention Alliance represent a unique blending of two separate, but complementary programs. Administered by the Center for Environmental Policy at the University of South Carolina's Institute of Public Affairs, these programs share the goal of achieving environmental excellence through pollution prevention and resource conservation. The Environmental Excellence program is designed to reward and recognize entities that have voluntarily moved beyond regulatory compliance using pollution prevention, waste reduction, and resource conservation strategies. The Alliance is facilitating efforts by the state's military bases to attain formal recognition for their achievements through the Environmental Excellence program.

This paper presents an overview of the Environmental Excellence program and the Alliance. It describes how the Environmental Excellence program is being used to further the goals of the Alliance. To the extent that other states may be considering the creation of similar programs or the expansion of existing programs, some suggestions or "lessons learned" are offered. Since both programs are relatively new, the paper will conclude with a discussion of plans for future activities.

THE SOUTH CAROLINA ENVIRONMENTAL EXCELLENCE PROGRAM

In developing the Environmental Excellence program, South Carolina has followed a trend set by numerous states, EPA, and several industry trade organizations to create programs designed to encourage and reward entities that voluntarily implement environmental strategies to move beyond regulatory compliance. Generally, environmental recognition programs share several common characteristics. The central component is the use of pollution prevention to achieve environmental progress. A second element is a demonstration of commitment by senior management within the organization to ongoing waste reduction. Another component is formal recognition and program benefits that accrue for achieving environmental leadership status. Finally, most programs require some level of community outreach and public service.

Almost two years ago, a group of industry, environmental, and state agency leaders came together to discuss the possibility of creating an environmental recognition program for South Carolina. Discussions were initiated through the Institute of Public Affairs at the University of South Carolina and its Center for Environmental Policy. The Institute has been involved in a number of environmental initiatives for several years, including the administration of the Governor's Annual Pollution Prevention Award. Through its Center for Environmental Policy, the Institute also operates an industrial technical assistance program that works closely with the state's regulatory agency, the Department of Health and Environmental Control (DHEC), and its pollution prevention program.

A steering committee was formed to design the specifics of the program. Members represented a broad cross-section of interests and included the following: the State Chamber of Commerce; the S.C. Manufacturers Alliance; the S.C. Pulp and Paper Association; the Department of Natural Resources; DHEC; the State Energy office; the S.C. League of Women Voters; the S.C. Sierra Club; and the S.C. Wildlife Federation. An early decision was made by the steering committee to house the program within the Institute as a "neutral" third party. This decision was made, in part, because of concerns that businesses might be reluctant to participate in a program administered by the state's environmental regulators. For similar reasons, the steering committee avoided using the term "environmental leadership" in the program title because it did not want the state program to be confused with EPA's pilot program by the same name.

The overall objective of the Environmental Excellence program is to encourage entities to become environmental leaders through a demonstrated commitment to pollution prevention, and energy or other resource conservation. Membership applications include a statement which must be signed by senior management indicating a commitment to (1) reduce waste streams through pollution prevention and (2) share knowledge with others through the program. Applications may be submitted by either a "company" or a "facility." A company may apply on behalf of all of its plants in the state, or an individual plant may apply on its own. A "facility" is broadly defined to include not only a manufacturing plant but also a public or private non-manufacturing entity. This distinction is important for the Department of Defense Alliance because it allows military bases to apply for membership into the program.

In designing the program, the steering committee attempted to keep the application process as streamlined as possible. Industry members felt strongly that if an entity had already achieved superior environmental progress and been recognized for it, it should not have to go through a duplicative process for membership in the state program. This led to the creation of a two-tiered application process. First, an entity that is already an active member of a substantially similar program such as the American Textile Manufacturers Institute's Encouraging Environmental Excellence program or the Chemical Manufacturers Association's Responsible Care program, may submit documentation from that organization and request reciprocal membership in the state program. The second option is to submit an environmental excellence plan that includes measurable targets to reach waste reduction goals. The plan must also include a

commitment by senior management to establish a facility-wide environmental management system.

To maintain the integrity of the program, all applicants must describe their environmental compliance record over the past five years. Information concerning major violations, fines, and exceedances must be included. The concern is not for a single violation or an isolated incident, but rather for evidence of a pattern of enforcement issues that indicate a lack of commitment to continuous environmental improvement. The review committee may also request a site visit as part of the application process. This was a source of debate among the industry members some of whom felt strongly that for proprietary reasons and the highly competitive nature of some manufacturing sectors, requiring a site visit would serve as a disincentive to participate in the program. The compromise was to reserve the right of the committee to request a site visit in situations where there was some question about the applicant's environmental performance.

To be a meaningful program, clear benefits for participation were needed. Several steering committee members felt strongly that simply having another logo or awards program was not enough. They felt that the real benefit to being a member of the program should be the opportunity to have a "seat at the table" to share ideas with regulatory officials and other members, to serve as pilot sites when opportunities for regulatory flexibility arise, and to mentor other companies that may not be as environmentally progressive. DHEC's willingness to actively participate in the development of the regulatory incentives was instrumental in creating meaningful opportunities for the program's members. In fact, a crucial selling point for the military bases to participate in the Alliance and to work towards membership in the Environmental Excellence program was the opportunity to work with DHEC on regulatory flexibility issues.

THE SOUTH CAROLINA/DEPARTMENT OF DEFENSE P2 ALLIANCE

The South Carolina/Department of Defense Pollution Prevention Alliance ("Alliance") is patterned after the Texas Pollution Prevention Partnership. The Texas partnership includes state and federal regulatory agencies, the Department of Defense, the National Guard, the Coast Guard and the NASA-Johnson Space Center. It is designed to use pollution prevention as the preferred environmental alternative to enhance mission readiness and to integrate pollution prevention into the every day activities of military installations in Texas. The Air Force Center for Environmental Excellence was instrumental in developing the Texas partnership, and actively encouraged other states like South Carolina to initiate similar programs.

The process for establishing the Alliance in South Carolina began with a meeting of the regional environmental coordinators for the Army, Navy, Marines, and Air Force. Representatives from the National Guard also attended along with a representative from EPA Region 4 and the Air Force Center for Environmental Excellence. The meeting was co-hosted by the Center for Environmental Policy and DHEC's Center for Waste Minimization. The positive results of the initial meeting led to a second meeting with

representatives from all of the state's military bases. The regional environmental coordinators were instrumental in soliciting participation by the bases.

South Carolina has a strong military presence with each of the service branches having at least one installation in the state. The military bases represented at the second meeting included Charleston Air Force Base, Shaw Air Force Base, Fort Jackson Army Post, Charleston Naval Weapons Station, Marine Corps Air Station in Beaufort, Marine Corps Recruiting Station in Parris Island, McEntire Air National Guard, and the S.C. Army National Guard. At this meeting, interest in forming the Alliance was solidified, and discussions took place about the kinds of activities that would be most useful to the bases. The third meeting was hosted by Fort Jackson Army base. In addition to a half day tour of Fort Jackson's pollution prevention and recycling programs, the meeting included a more detailed presentation of the Environmental Excellence program and a review of the draft charter to formalize the Alliance. At this writing, the Alliance charter is being prepared for signature, and all of the state's military bases along with the S.C. National Guard have agreed to participate.

The overall goal of the Alliance is to implement pollution prevention strategies as the preferred environmental alternative to enhance mission readiness, to maintain and exceed compliance requirements, and to reduce the generation of pollutants. While the military bases have communicated in the past on environmental restoration and regulatory compliance issues through DHEC's federal facilities ombudsman, the Alliance provides a forum for the bases' pollution prevention coordinators to share information and exchange ideas as well as to actively interact with EPA and DHEC officials.

THE CONVERGENCE OF PROGRAM GOALS

The emphasis on pollution prevention and the commitment to moving beyond environmental compliance are the shared goals that join together the Alliance and the Environmental Excellence program. The military bases were interested in the Environmental Excellence program for several reasons. First, the program was compatible with the bases' pollution prevention goals and objectives. Second, the program offered an opportunity for individual bases to be formally recognized for their achievements in pollution prevention and waste reduction. Third, the bases were very interested in the possibility of serving as "test" sites for experiments with regulatory flexibility, and in working with DHEC and the EPA regional office on regulatory incentives for superior environmental performance.

For the Environmental Excellence program, allowing military bases to apply for membership was consistent with a longer range objective of the program to broaden its focus beyond the private manufacturing sector. In the past, several military bases have applied for and been awarded the Governor's Annual Pollution Prevention Award. The Environmental Excellence program was an opportunity to systematically encourage and recognize other bases that achieved successes in pollution prevention and waste reduction.

"LESSONS LEARNED"

For the Environmental Excellence Program

Even though the Environmental Excellence program is still relatively new (it was announced in October, 1997), some observations that suggest what worked in developing the program are apparent. First, it is critical to have a diversity of interests represented at the table. The Sierra Club representative often differed with the industry representative and the industry representative often differed with the DHEC official. But the end result was a balanced program that reflected the variety of perspectives brought to the table. The process for designing the program was consensus-based and, where there was disagreement, compromises were devised.

The diversity of interests represented in the design of the program also helped to strengthen the formal support base for the program once it was completed. All of the organizations that were represented on the steering committee became formal sponsors of the program. No organization walked away from the table and, in fact, two additional program sponsors specifically asked to be included after the fact. This broad base of support also created a network through which information about the program could be disseminated. Spreading the word about the program was time-consuming and slow initially, but the sponsoring organizations provided resources in the way of newsletters, speaking engagements and other avenues to promote the program.

Another critical element was the formal endorsement by DHEC. Having DHEC committed to working with Environmental Excellence members on regulatory and other issues was an important selling point for companies that might otherwise be reluctant to go through the application process. The committee sought, but failed to obtain, a similar endorsement from the Governor's office. While that office was kept informed of the deliberations and invited to participate, to date the Governor has not officially endorsed the program. As momentum for the program grows, it is anticipated that the Governor's office will become more involved.

From a programmatic standpoint, one of the key considerations was how to maintain the integrity of the membership through the selection process. There was strong sentiment against allowing companies into the program that were not in fact proven environmental leaders. One way the committee addressed this was in the screening of an applicant's past compliance record. A second way was in requiring the development of an environmental excellence plan. For entities applying for reciprocal membership, the committee carefully reviewed the programs to ensure that their goals and objectives were consistent with the state program.

For the Department of Defense Alliance

The Alliance was formed in a relatively short time span of less than a year. There are several reasons for this. First, the active involvement of the Air Force Center for Environmental Excellence at the outset lent credibility and focus to the effort. Second,

the early involvement and support of the regional environmental coordinators eased the way for the state's military bases to come together. Third, the already strong working partnership between DHEC's Center for Waste Minimization and USC's Center for Environmental Policy made it easier to join forces and work with one another. Specifically, DHEC's willingness to support the Alliance through its Center and by the active participation of its federal facilities ombudsman, strengthened the incentive for the military bases to come to the table. As a result, the Alliance meetings have served as a forum for asking questions about regulatory requirements and for raising issues that may be specific to an individual base. The presence of representatives from the EPA regional office also lent credibility and strength to the effort. And finally, the Alliance's decision to seek membership in the Environmental Excellence program gave the bases an additional incentive for achieving their pollution prevention goals.

CONCLUSION

As part of the continued development of the Alliance, a work group has been formed to work with staff for the Environmental Excellence program, to develop a standardized format for applications for membership into the program. Other work groups formed by the Alliance include a recycling work group to look at such issues as increasing recycling rates among the housing units on base, a regulatory work group charged with looking at the number and origin of regulatory requirements, and where opportunities for flexibility may exist; and a work group to explore "best management practices" in pollution prevention.

The Environmental Excellence program will continue to promote the program statewide and, through coordinated efforts between DHEC and the Center for Environmental Policy, continue to develop program activities for members. At this writing, an Environmental Excellence web page is being completed and a full-time coordinator is being hired. DHEC has arranged the first of several meetings with Environmental Excellence members to discuss issues of concern to them and to introduce state and local DHEC officials. This is an important first step in the ongoing development of relationships with DHEC officials and with other EEP members. Planned future activities include participation of Environmental Excellence members in the National Pollution Prevention Week in September, and site visits to formally present membership certificates.

The Environmental Excellence program and the Department of Defense Pollution Prevention Alliance are examples of the state's continued efforts to systematically promote pollution prevention as the preferred alternative and to reward facilities that achieve superior environmental performance through pollution prevention. Through the Alliance, the state's military bases can continue to work towards their pollution prevention goals. With the Environmental Excellence program, the bases have a unique opportunity to have their accomplishments showcased through membership in the program and, most importantly, to be recognized as environmental leaders in South Carolina and by their respective military commands.